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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION**

MD No. 02641

**STIPULATION TO EXTEND TIME
TO FILE PROPOSED PARTY FACT
SHEETS**

This Court's Case Management Order No. 5 provides that the parties should submit proposed forms of Plaintiffs' and Defendants' Fact Sheets on or before January 15, 2016. The parties have met and conferred in advance of the Court's case management conference scheduled for January 29, 2016, and intend to address the foregoing fact sheets as part of determining the process for Bellwether cases. Accordingly, the parties stipulate and jointly request the Court to extend the time for the parties to file the proposed fact sheets until after the parties have proposed a Bellwether process (which the parties intend to address at the January 29, 2016 case management conference).

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1 DATED this 15th day of January 2016.

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3 GALLAGHER & KENNEDY, P.A.

NELSON MULLINS RILEY &
SCARBOROUGH LLP

4 By: /s/ Paul Stoller

By: /s/ Richard B. North, Jr.

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14 **CERTIFICATE OF SERVICE**

15 I hereby certify that on this 15th day of January, 2016, I electronically transmitted
16 the attached document to the Clerk's Office using the CM/ECF System for filing and
17 transmittal of a Notice of Electronic Filing.
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19 /s/ Nancy Jo Koenes
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